

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

X

MICHAEL TWEED,

Plaintiff,

-against-

**GLEN COVE CITY SCHOOL DISTRICT, GLEN
COVE CITY SCHOOL DISTRICT BOARD OF
EDUCATION, and MARIA RIANNA, in her official
Capacity as Superintendent of Schools, MAUREEN
PAPPACRISTOU, GAIL NEDBOR-GROSS, DONNA
BRADY, BARRIE DRATCH, RICHARD MACCARONE,
GRADY FARNAN, AND DAVID HIGGINS,**

Defendants.

X

**DECLARATION IN
OPPOSITION TO
DEFENDANTS'
MOTION TO DISMISS**

**14 CV4154
(LDW) (SIL)**

ARTHUR P. SCHEUERMANN, ESQ., an attorney duly admitted to practice law in the United States District Court for the Eastern District of New York, hereby deposes and says subject to the penalties of perjury:

1. I am General Counsel of the School Administrators Association of New York State, attorneys for the Plaintiff, Michael Tweed.
2. I am fully familiar with the facts and circumstances of this matter based on my review of the file maintained by my office in prosecution of this litigation.
3. This Declaration is submitted in opposition of the defendants' Motion to Dismiss the plaintiff's Amended Complaint ("the Complaint") pursuant to Rules 12[c] of the Federal Rules of Civil Procedure.
4. In opposition of the District defendants' Motion, annexed hereto as Exhibit "A" through "J" are the following:

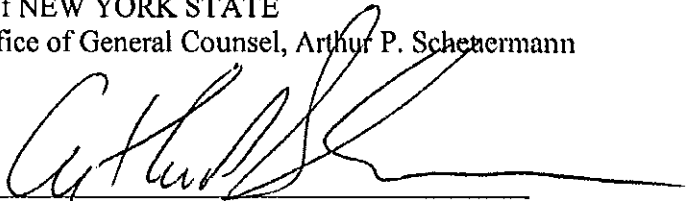
- A. Michael Tweed Appointment Letter dated June 7, 2011 as an employee of the Defendant Glen Cove City School District.
- B. Nassau County Grand Jury Subpoena Duces Tecum issued to Michael Tweed commanding his appearance before the Nassau County Grand Jury on May 30, 2013 in connection with a corruption probe of the Glen Cove City School District, its officials and employees.
- C. Newsday Article, July 30, 2014, reprinted:
<http://www.newsday.com/long-island/education/eight-in-glen-cove-cheating-scandals-paid-144-522-in-fines-1.8928300>.
- D. Settlement Agreement and General Release involving Allen Hudson and the Glen Cove City School District executed by the Superintendent of Schools Maria L. Rianna and Donna Brady President of the Board of Education, on September 24, 2013.
- E. Settlement Agreement and General Release involving Melanie Affman and Glen Cove City School District executed by the Superintendent of Schools Maria L. Rianna and Donna Brady President of the Board of Education, on September 19, 2013.
- F. Board Policies 7210 and 7211, 4210, 4211, 4330.
- G. State Education Department's Appeal to Graduate with a lower score on a Regents Examination information.
- H. Glen Cove City School District Board of Education Meeting Minutes for July 1, 2013, p. 1.
- I. Glen Cove City School District Board of Education Meeting Minutes for August 26, 2013, p. 3 Superintendent's Report.

J. Glen Cove City School District Board of Education Agenda for November 4,
2013 Board Meeting, p. 10. Election results for vacant board seat.

Dated: Latham, New York
January 5, 2015

SCHOOL ADMINISTRATORS ASSOCIATION
of NEW YORK STATE
Office of General Counsel, Arthur P. Scheuermann

By:


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